

Stakeholder Reference:  
Document Reference:

Part A

Making representation as Agent on behalf of Landowner or Land Promoter

Personal Details		Agent's Details (if applicable)
Title	Mr	
First Name	Michael	John
Last Name	Meredith	Lawson
Job Title (where relevant)	Director of Strategy and Estates	Managing Director
Organisation (where relevant)	Princess Alexandra Hospital NHS Trust, c/o Lawson Planning Partnership Ltd	Lawson Planning Partnership Ltd
Address		
Post Code		
Telephone Number		
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## Part B

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### REPRESENTATION

**To which Main Modification number and/or supporting document of the Local Plan does your representation relate to?**

MM no: 16

Supporting document reference:

**Do you consider this Main Modification and/or supporting document of the Local Plan to be:**

Legally compliant: Yes

Sound: No

If no, then which of the soundness test(s) does it fail? Positively prepared, Effective, Justified, Consistent with national policy

**Please give details of why you consider the Main Modification and/or supporting document is not legally compliant or is unsound. Please be as precise as possible. If you wish to support the legal compliance, soundness of the Local Plan or compliance with the duty to co-operate, please also use this box to set out your comments.**

Please see attached Lawson Planning Partnership Ltd representation letter dated 22nd September 2021 for full details. Representation summarised below as follows:

Chapter 2 Strategic Context and Policies

MM16 Supporting Text to Policy SP3 Place Shaping (Page 33-36)

PAH supports the insertion of new paragraphs after paragraph 2.88 to recognise the role of health and wellbeing principles in place shaping and refer to the carrying out of Health Impact Assessments (HIAs) for large development proposals, to ensure that development will help to encourage opportunities for healthy living and ensure access to appropriate healthcare services continues to be provided for the new development and community as a whole.

However, PAH objects to part of MM16 and also considers that AM16 & AM110 represent Main Modifications on which representations may be made.

Figure 2.1 as proposed illustrates the requirement for an endorsed Strategic Masterplan prior to the determination of any planning applications for development proposals in relation to the new Garden Communities.

PAH notes the Council's related proposed amendments to Policy SP5 Garden Town Communities (AM16) to amend Part D of the Policy, as follows:

'D. Development proposals in relation to sites SP54.1-54.3 will be required to be in general conformity with a Strategic Masterplan which has been endorsed approved by the Council prior to the determination of any planning applications.'

PAH also notes the Council's proposed amendments to the Glossary definition of 'Strategic Masterplan' (AM110), as follows:

‘A masterplan is the process by which organisations undertake analysis and prepare strategies, and the proposals that are needed to plan for major change in a defined physical area. It acts as a context from which development projects come forward for parts of the area. Is a plan that takes a comprehensive approach to the planning and delivery of Strategic Masterplan Areas and associated infrastructure. The Masterplan should be produced and undertaken jointly by the landowners/promoters of the relevant sites and endorsed by the Council prior to the determination of any planning applications. Planning applications and any other consenting mechanisms for sites located within the Strategic Masterplan Area must be in general conformity with the Strategic Masterplan which has been formally endorsed by the Council.’

Policy SP5 along with its supporting text as proposed, requires development proposals in relation to the new Garden Communities to be in general conformity with a Strategic Masterplan which has been approved by the Council prior to the determination of any planning applications, without recognising PAH’s exceptional circumstances.

Whilst PAH acknowledges the principle of requiring an endorsed strategic masterplan for the new Garden Communities respectively to holistically guide development, the new Hospital represents an exception to this policy requirement for two principal reasons. First, there seems to have been little progress on the preparation of a strategic masterplan for the East of Harlow site. We understand that this is not currently being progressed by either the consortium of landowners or the planning authorities. Consequently, the preparation and approval of a strategic masterplan here is some way off being completed and is therefore, significantly behind PAH’s current programme for the delivery of a new Hospital. PAH’s related planning application(s) would therefore, need to be treated as a departure to the Local Plan policy if the MM and AM was taken forward. The delivery of a new Hospital represents important strategic infrastructure of a substantial scale in its own right, which is needed to meet the acute healthcare needs of the existing and new Garden Town communities and wider catchment population area, which is supported by the related planning and transport authorities. The development of a new Hospital East of Harlow would provide a cornerstone and gateway development and opportunity for the subsequent strategic masterplan to embrace. Therefore, it would be prudent to acknowledge this position in the Local Plan as suggested.

This position is acknowledged in paragraph 1.3 of Supporting Document K (SoCG Addendum East of Harlow September 2020 between EFDC, Harlow DC, Miller Homes, and PAH), all parties agree that the distribution of land uses across the whole Site, including the northern extent, is to be determined via the Strategic Masterplanning process pursuant to LPSV policy SP3. Notwithstanding the Strategic Masterplanning process, it is agreed that the Hospital is likely to be delivered North of the M11 Junction 7a East-West link road and the site location of the Hospital may be determined in advance of the Strategic Masterplan process being completed. Subsequent work progressed through the related PAH Planning Performance Agreement (PPA) process also acknowledges this position.

It is therefore, considered that MM16 provides insufficient flexibility to enable the early delivery of the new Hospital without having to depart from Local Plan policy at an early stage, when the situation was apparent prior to the adoption of the Local Plan. This approach is neither justified, nor effective and is not consistent with recent updates to National policy which seeks to ensure faster delivery of public service infrastructure including hospitals. (para. 96, NPPF 2021). As set out at paragraph 9, the above concerns and objections currently render the Local plan MMs unsound when considered against the related tests set out in paragraph 35 of the NPPF.

**Please set out what change(s) you consider necessary to make the Main Modification and/or supporting document legally compliant or sound, having regard to the test you have identified in the question above (Positively prepared/Justified/Effective/Consistent with national policy) where this relates to soundness. You will need to say why this change will make the Submission Version of the Local Plan legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.**

PAH therefore requests a footnote be added after Figure 2.1/ the insertion of a separate paragraph to Policy SP5 saying:

‘In the case of the potential relocation of PAH to the identified East of Harlow site, the Council is content for the related planning application(s) to be progressed and determined in advance of a related Strategic Masterplan being formally approved, although the PAH scheme will need to explain how wider strategic masterplanning considerations have been taken into account.’

It is considered that this amendment would address the soundness objection.

Please see attached Lawson Planning Partnership Ltd representation letter dated 22nd September 2021 for full details.

## REPRESENTATION

**To which Main Modification number and/or supporting document of the Local Plan does your representation relate to?**

MM no: 17

Supporting document reference:

**Do you consider this Main Modification and/or supporting document of the Local Plan to be:**

Legally compliant: Yes

Sound: Yes

If no, then which of the soundness test(s) does it fail?

**Please give details of why you consider the Main Modification and/or supporting document is not legally compliant or is unsound. Please be as precise as possible. If you wish to support the legal compliance, soundness of the Local Plan or compliance with the duty to co-operate, please also use this box to set out your comments.**

Please see attached Lawson Planning Partnership Ltd representation letter dated 22nd September

2021 for full details. Representation details also shown below as follows:

Chapter 2 Strategic Context and Policies  
MM17 Policy SP3 Place Shaping (Page 34)

PAH supports the insertion of a new Part after Part I as proposed, to recognise health and wellbeing

principles in place shaping, and the requirement for relevant development proposals to assess the extent of potential health impacts through a Health Impact Assessment (HIA) and the expectation that

new development will contribute towards the provision of built facilities and other improvements to healthcare services, where appropriate.

**Please set out what change(s) you consider necessary to make the Main Modification and/or supporting document legally compliant or sound, having regard to the test you have identified in the question above (Positively prepared/Justified/Effective/Consistent with national policy) where this relates to soundness. You will need to say why this change will make the Submission Version of the Local Plan legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.**

## REPRESENTATION

**To which Main Modification number and/or supporting document of the Local Plan does your representation relate to?**

MM no: 18

Supporting document reference: I. IDP: Part B Infrastructure Delivery Schedule 2020 Update (ED117/EB1118)

**Do you consider this Main Modification and/or supporting document of the Local Plan to be:**

Legally compliant: Yes

Sound: Yes

If no, then which of the soundness test(s) does it fail?

**Please give details of why you consider the Main Modification and/or supporting document is not legally compliant or is unsound. Please be as precise as possible. If you wish to support the legal compliance, soundness of the Local Plan or compliance with the duty to co-operate, please also use this box to set out your comments.**

Please see attached Lawson Planning Partnership Ltd representation letter dated 22nd September

2021 for full details. Representation details also shown below as follows:

Chapter 2 Strategic Context and Policies

MM18 Supporting Text to Policy SP4 Development & Delivery of Garden Communities in the Harlow

and Gilston Garden Town (Page 37-38)

PAH supports the insertion of the new paragraph after paragraph 2.117 as proposed to ensure a cohesive approach to the Garden Town, prevent the establishment of unsustainable travel behaviour and to provide viable alternatives to private car use. The new Hospital east of Harlow may potentially be delivered in advance of the Sustainable Transport Corridors, although alternative sustainable travel measures will be put in place in the interim period.

PAH supports the insertion of the new paragraph following paragraph 2.118 as proposed to reflect the Inspector's Interim findings. The new paragraph refers to HGGT IDP (2019) and notes District-level updates will be cognisant of the Garden Town and vice versa.

In June 2021, HGGT sought significant new or revised information on infrastructure requirements identified for the Garden Town area since the previous IDP was produced in 2019, to inform a partial

update of the HGGT IDP. Health and care services and the way they are organised both from a commissioner and provider perspective will change over the lifespan of the local plan. Further detail

is provided in PAH's representations to MM106, which requests that the Epping Forest District IDP

2020 (Supporting Document I.) is updated as set out in response to MM106.

**Please set out what change(s) you consider necessary to make the Main Modification and/or supporting document legally compliant or sound, having regard to the test you have identified in the question above (Positively prepared/Justified/Effective/Consistent with national policy) where this relates to soundness. You will need to say why this change will make the Submission Version of the Local Plan legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.**

## REPRESENTATION

**To which Main Modification number and/or supporting document of the Local Plan does your representation relate to?**

MM no: 19

Supporting document reference:

**Do you consider this Main Modification and/or supporting document of the Local Plan to be:**

Legally compliant: Yes

Sound: No

If no, then which of the soundness test(s) does it fail? Positively prepared, Effective, Justified, Consistent with national policy

**Please give details of why you consider the Main Modification and/or supporting document is not legally compliant or is unsound. Please be as precise as possible. If you wish to support the legal compliance, soundness of the Local Plan or compliance with the duty to co-operate, please also use this box to set out your comments.**

Please see attached Lawson Planning Partnership Ltd representation letter dated 22nd September

2021 for full details. Representation details also shown below as follows:

Chapter 2 Strategic Context and Policies

MM19 Policy SP4 Development and Delivery of Garden Communities in the Harlow and Gilston Garden Town (Page 40-41)

PAH supports the principle of amendment to Policy SP4 Part C(iv) as proposed for clarity that governance and stewardship arrangements are in place prior to the determination rather than the submission of outline planning applications. However, PAH objects to the MM as it should be recognised that the level of detail required should be proportional to an outline planning application.

PAH supports the insertion of the new point after Policy SP4 Part C(xviii) to further clarify the Council's position that key transport infrastructure and sustainable transport (providing viable alternatives to the private car) are provided as prerequisites of development being occupied, along with measures to ensure its upkeep/ maintenance. However, it is noted that the policy will need to be applied pragmatically to recognise the opportunities and constraints associated with particular land uses, including the unique travel patterns associated with an acute hospital.



**Please set out what change(s) you consider necessary to make the Main Modification and/or supporting document legally compliant or sound, having regard to the test you have identified in the question above (Positively prepared/Justified/Effective/Consistent with national policy) where this relates to soundness. You will need to say why this change will make the Submission Version of the Local Plan legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.**

It is therefore, requested that Policy SP4C(iv) is amended to read as follows (proposed changes shown in italics):

‘(iv) Agreeing appropriate and sustainable long-term governance and stewardship arrangements for community assets including heritage assets, green space, the public realm areas and community and other relevant facilities prior to the determination of outline planning applications. Such arrangements will be funded by the development and include community representation to ensure residents have a stake in long term development, stewardship and management of their community. The level of detail required should be proportional to an outline planning application and specific to each particular development proposal;’

Please see attached Lawson Planning Partnership Ltd representation letter dated 22nd September 2021 for full details.

## REPRESENTATION

**To which Main Modification number and/or supporting document of the Local Plan does your representation relate to?**

MM no: 21

Supporting document reference: K. Statement of Common Ground Addendum East of Harlow, September 2020 (ED122A-B)

**Do you consider this Main Modification and/or supporting document of the Local Plan to be:**

Legally compliant: Yes

Sound: No

If no, then which of the soundness test(s) does it fail? Positively prepared, Effective, Justified, Consistent with national policy

**Please give details of why you consider the Main Modification and/or supporting document is not legally compliant or is unsound. Please be as precise as possible. If you wish to support the legal compliance, soundness of the Local Plan or compliance with the duty to co-operate, please also use this box to set out your comments.**

Please see attached Lawson Planning Partnership Ltd representation letter dated 22nd September

2021 for full details. Representation details also shown below as follows:

## Chapter 2 Strategic Context and Policies

### MM21 Policy SP5 Garden Town Communities (Page 42-44)

PAH supports the inclusion of the New Map after Map 2.1 and new section after SP5 Part E as proposed to include Sustainable Transport Corridor routes within the Plan. However, PAH objects to

the variation of this Map from the HGGT Vision & Design Guide Key Diagram.

PAH objects to the text of the proposed New Section after Part H. As currently worded, it suggests that through the preparation of the Strategic Masterplan it may be concluded that the proposed hospital forming part of the community and healthcare facilities could be located in the part of East of

Harlow Garden Community in Harlow District. However, concerning the Hospital, no such proposal

has recently been considered and no agreement is in place with the landowners in this respect and

this does not reflect the position in Supporting Document K (SoCG Addendum East of Harlow September 2020 between EFDC, Harlow DC, Miller Homes, and PAH). As explained above, the broad location of the new hospital site, which lies within the Epping Forest District part of the strategic

site allocation, has been established and reflected in the HGGT Key Diagram and agreed in planning

terms with the local planning and transport authorities. There is no planning or development option to

locate the new Hospital within the Harlow District part of the East of Harlow strategic site allocation

and therefore for the soundness reasons set out, the policy criterion should be amended as suggested. PAH does however, acknowledge that a fall back policy addition is needed to determine

suitable land uses in the event that the Hospital does not relocate from its current location in central

Harlow.

**Please set out what change(s) you consider necessary to make the Main Modification and/or supporting document legally compliant or sound, having regard to the test you have identified in the question above (Positively prepared/Justified/Effective/Consistent with national policy) where this relates to soundness. You will need to say why this change will make the Submission Version of the Local Plan legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.**

PAH therefore, requests the New Map is updated to reflect the key diagram in the HGGT Vision and

Design Guide documents, which indicate the intended hospital site at East Harlow as 'Land only to

be developed for potential hospital relocation'. The broad location of the Hospital is north of the eastwest

M11 Junction 7a link road and south of Pincey Brook.

This position is further supported by the SoCG 2020 Addendum (Supporting Document K (ED122AB))

in which the parties agree the Hospital is likely to be delivered North of the M11 Junction 7a East-West link road and the location of the hospital may be determined in advance of the Strategic Masterplan Process being completed. The matter has also been addressed as part of the related PPA process between PAH and the authorities.

PAH therefore requests that Policy SP5 new section after Part H is to read as follows (proposed changes shown in italics):

'The East of Harlow strategic site allocation (SP 4.3) forms part of a wider Garden Community, the southern part of which has been allocated in the Harlow Local Development Plan (under Policy HGT

1). The Garden Community will be subject to the preparation of a single Strategic Masterplan. Through the preparation of the Strategic Masterplan, the extent of development across the masterplan area and the position of a build-to line will need to be agreed in order to appropriately safeguard the settlement edge of Sheering. If it is concluded that the proposed secondary school and/or community and health facilities identified in this policy are not to be delivered within the Epping Forest District part of the Garden Town community, consideration will be given to the appropriate mix and balance of those land uses and the associated infrastructure that should be delivered within the strategic site allocation SP4.3. In determining the appropriate mix and balance of

land uses, the Council will have regard to relevant policies within this Plan, in particular: Parts A. to F.

of this policy; policies SP2 and SP3; the identified need for the types of development proposed within

the wider Garden Community; and relevant environmental, heritage, transport, infrastructure and other planning opportunities and constraints.'

Proposed amended Map 2.1 Garden Communities around Harlow incorrectly identifies the Garden

Communities as 'Residential site allocations' in the Legend, rather than 'Strategic site allocations' where a mix of uses is expected. PAH therefore requests the Legend be corrected.

Proposed amended Map 2.4 East of Harlow Strategic Masterplan Area incorrectly identifies the site

as 'Residential site allocation' in the Legend, rather than 'Strategic site allocation' where a range of

uses is expected. PAH therefore, requests the Legend be corrected. PAH also requests that the potential hospital relocation site is shown with an indicative 'H' to be consistent with the Garden Town

and Harlow Local Plans.

It is considered that the above amendments would address the soundness objections.

Please see attached Lawson Planning Partnership Ltd representation letter dated 22nd September 2021 for full details.



## REPRESENTATION

**To which Main Modification number and/or supporting document of the Local Plan does your representation relate to?**

MM no: 40

Supporting document reference:

**Do you consider this Main Modification and/or supporting document of the Local Plan to be:**

Legally compliant: Yes

Sound: No

If no, then which of the soundness test(s) does it fail? Positively prepared, Effective, Justified, Consistent with national policy

**Please give details of why you consider the Main Modification and/or supporting document is not legally compliant or is unsound. Please be as precise as possible. If you wish to support the legal compliance, soundness of the Local Plan or compliance with the duty to co-operate, please also use this box to set out your comments.**

Please see attached Lawson Planning Partnership Ltd representation letter dated 22nd September

2021 for full details. Representation details also shown below as follows:

Chapter 3 Housing, Economic and Transport Policies

MM40 Supporting text to Policy T1 Sustainable Transport Choices (Page 72-73)

PAH considers the amendment to Paragraph 3.90 as proposed to provide clarification and to recognise the importance of accommodating and encouraging an uptake in electric vehicles is unsound. PAH agrees with the principle, but the proposed amendment does not take account of practicalities concerning specific non-residential developments such as an acute hospital with large scale parking provision. It would not be practicable or viable to provide all spaces with direct access to charging points.

**Please set out what change(s) you consider necessary to make the Main Modification and/or supporting document legally compliant or sound, having regard to the test you have identified in the question above (Positively prepared/Justified/Effective/Consistent with national policy) where this relates to soundness. You will need to say why this change will make the Submission Version of the Local Plan legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.**

PAH therefore, requests that the proposed final sentence of paragraph 3.90 be omitted, to read as follows (proposed changes shown in italics):

‘3.90 [...] In order to encourage and facilitate at the earliest possible opportunity the commitment by government and car manufacturers to cease sales of petrol, and diesel and hybrid cars by 2035 to support improvements in carbon emissions and air quality, the Council will require development proposals to make provision of electric vehicle charging points. This will apply to all new development which includes additional vehicle parking spaces.’

This matter was previously raised by LPP in a letter dated 10th June 2019 submitted to the EIP Programme Officer (copy attached) and the main considerations remain valid. It is considered that this amendment would address the soundness objection.

Please see attached Lawson Planning Partnership Ltd representation letter dated 22nd September 2021 for full details.

## REPRESENTATION

**To which Main Modification number and/or supporting document of the Local Plan does your representation relate to?**

MM no: 41

Supporting document reference:

**Do you consider this Main Modification and/or supporting document of the Local Plan to be:**

Legally compliant: Yes

Sound: No

If no, then which of the soundness test(s) does it fail? Positively prepared, Effective, Justified, Consistent with national policy

**Please give details of why you consider the Main Modification and/or supporting document is not legally compliant or is unsound. Please be as precise as possible. If you wish to support the legal compliance, soundness of the Local Plan or compliance with the duty to co-operate, please also use this box to set out your comments.**

Please see attached Lawson Planning Partnership Ltd representation letter dated 22nd September

2021 for full details. Representation details also shown below as follows:

Chapter 3 Housing, Economic and Transport Policies

MM41 Policy T1 Sustainable Transport Choices (Page 74-75)

PAH also considers the amendment to Part G of the Policy as proposed, is too onerous and inflexible

concerning an acute hospital development in particular. As currently proposed the amendment does

not take account of practicalities concerning developments such as an acute hospital with large scale

parking provision. It would not be practicable or viable to provide 100% direct access to electric charging points. Furthermore, the new hospital represents a trip destination, rather than a trip origin

use and it is likely that most electric car owners would charge their vehicle at home or via on-street

charging point parking bays. Requiring direct access to an electric vehicle charging point for all car parking spaces within the proposed hospital is not necessary or justified, and is contrary to National

policy which suggests a proportional approach and does not require that every parking space should

have access to an electric charging point.



**Please set out what change(s) you consider necessary to make the Main Modification and/or supporting document legally compliant or sound, having regard to the test you have identified in the question above (Positively prepared/Justified/Effective/Consistent with national policy) where this relates to soundness. You will need to say why this change will make the Submission Version of the Local Plan legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.**

PAH therefore requests that Part G of the Policy, be amended to read as follows (proposed changes shown in italics):

‘G. In order to support improvements in air quality within the District electric vehicle charging points  
will be required within all new developments which make provision for car parking for vehicles.”  
It is considered that this amendment would address the soundness objection.

Please see attached Lawson Planning Partnership Ltd representation letter dated 22nd September 2021 for full details.

## REPRESENTATION

**To which Main Modification number and/or supporting document of the Local Plan does your representation relate to?**

MM no: 43

Supporting document reference:

**Do you consider this Main Modification and/or supporting document of the Local Plan to be:**

Legally compliant: Yes

Sound: Yes

If no, then which of the soundness test(s) does it fail?

**Please give details of why you consider the Main Modification and/or supporting document is not legally compliant or is unsound. Please be as precise as possible. If you wish to support the legal compliance, soundness of the Local Plan or compliance with the duty to co-operate, please also use this box to set out your comments.**

Please see attached Lawson Planning Partnership Ltd representation letter dated 22nd September 2021 for full details. Representation details also shown below as follows:

Chapter 3 Housing, Economic and Transport Policies  
MM43 Policy T2 Safeguarding of Routes and Facilities

PAH supports the new wording before Part A as proposed to make specific reference to the requirement to safeguard land to deliver the transport improvements which are of strategic importance to the delivery of the Plan.

**Please set out what change(s) you consider necessary to make the Main Modification and/or supporting document legally compliant or sound, having regard to the test you have identified in the question above (Positively prepared/Justified/Effective/Consistent with national policy) where this relates to soundness. You will need to say why this change will make the Submission Version of the Local Plan legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.**

## REPRESENTATION

**To which Main Modification number and/or supporting document of the Local Plan does your representation relate to?**

MM no: 56

Supporting document reference:

**Do you consider this Main Modification and/or supporting document of the Local Plan to be:**

Legally compliant: Yes

Sound: Yes

If no, then which of the soundness test(s) does it fail?

**Please give details of why you consider the Main Modification and/or supporting document is not legally compliant or is unsound. Please be as precise as possible. If you wish to support the legal compliance, soundness of the Local Plan or compliance with the duty to co-operate, please also use this box to set out your comments.**

Please see attached Lawson Planning Partnership Ltd representation letter dated 22nd September

2021 for full details. Representation details also shown below as follows:

Chapter 4 – Development Management Policies  
MM56 Policy DM9 High Quality Design

PAH supports the insertion of a new part after Part I as proposed, to recognise health and wellbeing principles in place shaping.

**Please set out what change(s) you consider necessary to make the Main Modification and/or supporting document legally compliant or sound, having regard to the test you have identified in the question above (Positively prepared/Justified/Effective/Consistent with national policy) where this relates to soundness. You will need to say why this change will make the Submission Version of the Local Plan legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.**

## REPRESENTATION

**To which Main Modification number and/or supporting document of the Local Plan does your representation relate to?**

MM no: 78

Supporting document reference:

**Do you consider this Main Modification and/or supporting document of the Local Plan to be:**

Legally compliant: Yes

Sound: Yes

If no, then which of the soundness test(s) does it fail?

**Please give details of why you consider the Main Modification and/or supporting document is not legally compliant or is unsound. Please be as precise as possible. If you wish to support the legal compliance, soundness of the Local Plan or compliance with the duty to co-operate, please also use this box to set out your comments.**

Please see attached Lawson Planning Partnership Ltd representation letter dated 22nd September

2021 for full details. Representation details also shown below as follows:

Chapter 4 – Development Management Policies  
MM78 Policy P1 Epping

PAH supports the amendment to criterion D(ii) as proposed, to clarify the infrastructure requirements for Policy P1.

PAH supports the amendment to criterion K(ii) as proposed, to address concerns raised by ECC.

**Please set out what change(s) you consider necessary to make the Main Modification and/or supporting document legally compliant or sound, having regard to the test you have identified in the question above (Positively prepared/Justified/Effective/Consistent with national policy) where this relates to soundness. You will need to say why this change will make the Submission Version of the Local Plan legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.**

## REPRESENTATION

**To which Main Modification number and/or supporting document of the Local Plan does your representation relate to?**

MM no: 80

Supporting document reference:

**Do you consider this Main Modification and/or supporting document of the Local Plan to be:**

Legally compliant: Yes

Sound: Yes

If no, then which of the soundness test(s) does it fail?

**Please give details of why you consider the Main Modification and/or supporting document is not legally compliant or is unsound. Please be as precise as possible. If you wish to support the legal compliance, soundness of the Local Plan or compliance with the duty to co-operate, please also use this box to set out your comments.**

Please see attached Lawson Planning Partnership Ltd representation letter dated 22nd September

2021 for full details. Representation details also shown below as follows:

Chapter 4 – Development Management Policies

MM80 Policy P2 Loughton

PAH supports the amendment to criterion E(ii) as proposed, to clarify the infrastructure requirements for Policy P1.

**Please set out what change(s) you consider necessary to make the Main Modification and/or supporting document legally compliant or sound, having regard to the test you have identified in the question above (Positively prepared/Justified/Effective/Consistent with national policy) where this relates to soundness. You will need to say why this change will make the Submission Version of the Local Plan legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.**

## REPRESENTATION

**To which Main Modification number and/or supporting document of the Local Plan does your representation relate to?**

MM no: 84

Supporting document reference:

**Do you consider this Main Modification and/or supporting document of the Local Plan to be:**

Legally compliant: Yes

Sound: Yes

If no, then which of the soundness test(s) does it fail?

**Please give details of why you consider the Main Modification and/or supporting document is not legally compliant or is unsound. Please be as precise as possible. If you wish to support the legal compliance, soundness of the Local Plan or compliance with the duty to co-operate, please also use this box to set out your comments.**

Please see attached Lawson Planning Partnership Ltd representation letter dated 22nd September

2021 for full details. Representation details also shown below as follows:

Chapter 4 – Development Management Policies

MM84 Policy P4 Ongar

PAH supports new part after (i) as proposed, related to IDP update and exercise to ensure greater consistency across Plan in how infrastructure items are referred to.

**Please set out what change(s) you consider necessary to make the Main Modification and/or supporting document legally compliant or sound, having regard to the test you have identified in the question above (Positively prepared/Justified/Effective/Consistent with national policy) where this relates to soundness. You will need to say why this change will make the Submission Version of the Local Plan legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.**

## REPRESENTATION

**To which Main Modification number and/or supporting document of the Local Plan does your representation relate to?**

MM no: 85

Supporting document reference:

**Do you consider this Main Modification and/or supporting document of the Local Plan to be:**

Legally compliant: Yes

Sound: Yes

If no, then which of the soundness test(s) does it fail?

**Please give details of why you consider the Main Modification and/or supporting document is not legally compliant or is unsound. Please be as precise as possible. If you wish to support the legal compliance, soundness of the Local Plan or compliance with the duty to co-operate, please also use this box to set out your comments.**

Please see attached Lawson Planning Partnership Ltd representation letter dated 22nd September

2021 for full details. Representation details also shown below as follows:

Chapter 4 – Development Management Policies  
MM85 Policy P5 Buckhurst

PAH supports the new part after C as proposed, to clarify the infrastructure requirements for Policy P5.

**Please set out what change(s) you consider necessary to make the Main Modification and/or supporting document legally compliant or sound, having regard to the test you have identified in the question above (Positively prepared/Justified/Effective/Consistent with national policy) where this relates to soundness. You will need to say why this change will make the Submission Version of the Local Plan legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.**

## REPRESENTATION

**To which Main Modification number and/or supporting document of the Local Plan does your representation relate to?**

MM no: 87

Supporting document reference:

**Do you consider this Main Modification and/or supporting document of the Local Plan to be:**

Legally compliant: Yes

Sound: Yes

If no, then which of the soundness test(s) does it fail?

**Please give details of why you consider the Main Modification and/or supporting document is not legally compliant or is unsound. Please be as precise as possible. If you wish to support the legal compliance, soundness of the Local Plan or compliance with the duty to co-operate, please also use this box to set out your comments.**

Please see attached Lawson Planning Partnership Ltd representation letter dated 22nd September

2021 for full details. Representation details also shown below as follows:

Chapter 4 – Development Management Policies  
MM87 Policy P6 North Weald Bassett

PAH supports the new part after F and amendment as proposed, related to IDP update and exercise

to ensure greater consistency across Plan in how infrastructure items are referred to.

**Please set out what change(s) you consider necessary to make the Main Modification and/or supporting document legally compliant or sound, having regard to the test you have identified in the question above (Positively prepared/Justified/Effective/Consistent with national policy) where this relates to soundness. You will need to say why this change will make the Submission Version of the Local Plan legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.**



## REPRESENTATION

**To which Main Modification number and/or supporting document of the Local Plan does your representation relate to?**

MM no: 89

Supporting document reference:

**Do you consider this Main Modification and/or supporting document of the Local Plan to be:**

Legally compliant: Yes

Sound: Yes

If no, then which of the soundness test(s) does it fail?

**Please give details of why you consider the Main Modification and/or supporting document is not legally compliant or is unsound. Please be as precise as possible. If you wish to support the legal compliance, soundness of the Local Plan or compliance with the duty to co-operate, please also use this box to set out your comments.**

Please see attached Lawson Planning Partnership Ltd representation letter dated 22nd September

2021 for full details. Representation details also shown below as follows:

Chapter 4 – Development Management Policies  
MM89 Policy P7 Chigwell

PAH supports the new parts after (iii) as proposed, related to IDP update and exercise to ensure greater consistency across Plan in how infrastructure items are referred to.

**Please set out what change(s) you consider necessary to make the Main Modification and/or supporting document legally compliant or sound, having regard to the test you have identified in the question above (Positively prepared/Justified/Effective/Consistent with national policy) where this relates to soundness. You will need to say why this change will make the Submission Version of the Local Plan legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.**

## REPRESENTATION

**To which Main Modification number and/or supporting document of the Local Plan does your representation relate to?**

MM no: 90

Supporting document reference:

**Do you consider this Main Modification and/or supporting document of the Local Plan to be:**

Legally compliant: Yes

Sound: Yes

If no, then which of the soundness test(s) does it fail?

**Please give details of why you consider the Main Modification and/or supporting document is not legally compliant or is unsound. Please be as precise as possible. If you wish to support the legal compliance, soundness of the Local Plan or compliance with the duty to co-operate, please also use this box to set out your comments.**

Please see attached Lawson Planning Partnership Ltd representation letter dated 22nd September

2021 for full details. Representation details also shown below as follows:

Chapter 4 – Development Management Policies

MM90 Policy P8 Theydon Bois

PAH supports the new parts after (iii) as proposed, related to IDP update and exercise to ensure greater consistency across Plan in how infrastructure items are referred to.

**Please set out what change(s) you consider necessary to make the Main Modification and/or supporting document legally compliant or sound, having regard to the test you have identified in the question above (Positively prepared/Justified/Effective/Consistent with national policy) where this relates to soundness. You will need to say why this change will make the Submission Version of the Local Plan legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.**

## REPRESENTATION

**To which Main Modification number and/or supporting document of the Local Plan does your representation relate to?**

MM no: 92

Supporting document reference:

**Do you consider this Main Modification and/or supporting document of the Local Plan to be:**

Legally compliant: Yes

Sound: Yes

If no, then which of the soundness test(s) does it fail?

**Please give details of why you consider the Main Modification and/or supporting document is not legally compliant or is unsound. Please be as precise as possible. If you wish to support the legal compliance, soundness of the Local Plan or compliance with the duty to co-operate, please also use this box to set out your comments.**

Please see attached Lawson Planning Partnership Ltd representation letter dated 22nd September

2021 for full details. Representation details also shown below as follows:

Chapter 4 – Development Management Policies  
MM92 Policy P9 Roydon

PAH supports the remainder of part C to become new Part after Part C and specified elements amended as proposed, related to IDP update and exercise to ensure greater consistency across Plan

in how infrastructure items are referred to.

**Please set out what change(s) you consider necessary to make the Main Modification and/or supporting document legally compliant or sound, having regard to the test you have identified in the question above (Positively prepared/Justified/Effective/Consistent with national policy) where this relates to soundness. You will need to say why this change will make the Submission Version of the Local Plan legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.**

## REPRESENTATION

**To which Main Modification number and/or supporting document of the Local Plan does your representation relate to?**

MM no: 94

Supporting document reference:

**Do you consider this Main Modification and/or supporting document of the Local Plan to be:**

Legally compliant: Yes

Sound: Yes

If no, then which of the soundness test(s) does it fail?

**Please give details of why you consider the Main Modification and/or supporting document is not legally compliant or is unsound. Please be as precise as possible. If you wish to support the legal compliance, soundness of the Local Plan or compliance with the duty to co-operate, please also use this box to set out your comments.**

Please see attached Lawson Planning Partnership Ltd representation letter dated 22nd September

2021 for full details. Representation details also shown below as follows:

Chapter 4 – Development Management Policies  
MM94 Policy P10 Nazeing

PAH supports the new part after (i) as proposed, related to IDP update and exercise to ensure greater consistency across Plan in how infrastructure items are referred to.

**Please set out what change(s) you consider necessary to make the Main Modification and/or supporting document legally compliant or sound, having regard to the test you have identified in the question above (Positively prepared/Justified/Effective/Consistent with national policy) where this relates to soundness. You will need to say why this change will make the Submission Version of the Local Plan legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.**

## REPRESENTATION

**To which Main Modification number and/or supporting document of the Local Plan does your representation relate to?**

MM no: 96

Supporting document reference:

**Do you consider this Main Modification and/or supporting document of the Local Plan to be:**

Legally compliant: Yes

Sound: Yes

If no, then which of the soundness test(s) does it fail?

**Please give details of why you consider the Main Modification and/or supporting document is not legally compliant or is unsound. Please be as precise as possible. If you wish to support the legal compliance, soundness of the Local Plan or compliance with the duty to co-operate, please also use this box to set out your comments.**

Please see attached Lawson Planning Partnership Ltd representation letter dated 22nd September

2021 for full details. Representation details also shown below as follows:

Chapter 4 – Development Management Policies  
MM96 Policy P11 Thornwood

PAH supports the new parts after (i) as proposed, related to IDP update and exercise to ensure greater consistency across Plan in how infrastructure items are referred to.

**Please set out what change(s) you consider necessary to make the Main Modification and/or supporting document legally compliant or sound, having regard to the test you have identified in the question above (Positively prepared/Justified/Effective/Consistent with national policy) where this relates to soundness. You will need to say why this change will make the Submission Version of the Local Plan legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.**

## REPRESENTATION

**To which Main Modification number and/or supporting document of the Local Plan does your representation relate to?**

MM no: 98

Supporting document reference:

**Do you consider this Main Modification and/or supporting document of the Local Plan to be:**

Legally compliant: Yes

Sound: Yes

If no, then which of the soundness test(s) does it fail?

**Please give details of why you consider the Main Modification and/or supporting document is not legally compliant or is unsound. Please be as precise as possible. If you wish to support the legal compliance, soundness of the Local Plan or compliance with the duty to co-operate, please also use this box to set out your comments.**

Please see attached Lawson Planning Partnership Ltd representation letter dated 22nd September

2021 for full details. Representation details also shown below as follows:

Chapter 4 – Development Management Policies

MM98 Policy P12 Coopersale, Fyfield, High Ongar, Lower Sheering, Moreton, Sheering and Stapleford Abbotts

PAH supports the new points before (i) as proposed, to clarify the infrastructure requirements for Policy P12.

**Please set out what change(s) you consider necessary to make the Main Modification and/or supporting document legally compliant or sound, having regard to the test you have identified in the question above (Positively prepared/Justified/Effective/Consistent with national policy) where this relates to soundness. You will need to say why this change will make the Submission Version of the Local Plan legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.**

## REPRESENTATION

**To which Main Modification number and/or supporting document of the Local Plan does your representation relate to?**

MM no: 100

Supporting document reference:

**Do you consider this Main Modification and/or supporting document of the Local Plan to be:**

Legally compliant: Yes

Sound: Yes

If no, then which of the soundness test(s) does it fail?

**Please give details of why you consider the Main Modification and/or supporting document is not legally compliant or is unsound. Please be as precise as possible. If you wish to support the legal compliance, soundness of the Local Plan or compliance with the duty to co-operate, please also use this box to set out your comments.**

Please see attached Lawson Planning Partnership Ltd representation letter dated 22nd September

2021 for full details. Representation details also shown below as follows:.

Chapter 4 – Development Management Policies  
MM100 Policy P13 Rural Sites in the East of the District

PAH supports the remainder of F to become new part after F and specified amendments as proposed, related to IDP update and exercise to ensure greater consistency across Plan in how infrastructure items are referred to.

**Please set out what change(s) you consider necessary to make the Main Modification and/or supporting document legally compliant or sound, having regard to the test you have identified in the question above (Positively prepared/Justified/Effective/Consistent with national policy) where this relates to soundness. You will need to say why this change will make the Submission Version of the Local Plan legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.**

## REPRESENTATION

**To which Main Modification number and/or supporting document of the Local Plan does your representation relate to?**

MM no: 102

Supporting document reference:

**Do you consider this Main Modification and/or supporting document of the Local Plan to be:**

Legally compliant: Yes

Sound: Yes

If no, then which of the soundness test(s) does it fail?

**Please give details of why you consider the Main Modification and/or supporting document is not legally compliant or is unsound. Please be as precise as possible. If you wish to support the legal compliance, soundness of the Local Plan or compliance with the duty to co-operate, please also use this box to set out your comments.**

Please see attached Lawson Planning Partnership Ltd representation letter dated 22nd September

2021 for full details. Representation details also shown below as follows:

Chapter 4 – Development Management Policies

MM102 Policy P14 Rural Sites in the West of the District

PAH supports the remaining Part D to create new Part D as proposed, to clarify the infrastructure requirements for Policy P14.

**Please set out what change(s) you consider necessary to make the Main Modification and/or supporting document legally compliant or sound, having regard to the test you have identified in the question above (Positively prepared/Justified/Effective/Consistent with national policy) where this relates to soundness. You will need to say why this change will make the Submission Version of the Local Plan legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.**



## REPRESENTATION

**To which Main Modification number and/or supporting document of the Local Plan does your representation relate to?**

MM no: 106

Supporting document reference: I. IDP: Part B Infrastructure Delivery Schedule 2020 Update (ED117/EB1118)

**Do you consider this Main Modification and/or supporting document of the Local Plan to be:**

Legally compliant: Yes

Sound: No

If no, then which of the soundness test(s) does it fail? Positively prepared, Effective, Justified, Consistent with national policy

**Please give details of why you consider the Main Modification and/or supporting document is not legally compliant or is unsound. Please be as precise as possible. If you wish to support the legal compliance, soundness of the Local Plan or compliance with the duty to co-operate, please also use this box to set out your comments.**

Please see attached Lawson Planning Partnership Ltd representation letter dated 22nd September

2021 for full details. Representation details also shown below as follows:

#### Chapter 6 Infrastructure & Delivery

MM106 Policy D1 Delivery of Infrastructure (Page 183-184)

& Supporting Document I. IDP: Part B Infrastructure Delivery Schedule 2020 Update (ED117/EB118)

PAH supports the amendment to Part A of the Policy as proposed to provide further clarification in relation to the Council's approach to the consideration of viability matters at the development management stage.

PAH also supports new parts following A as proposed to provide further clarification in relation to the Council's approach to the consideration of viability matters at the development management stage.

As set out in our representation to MM18, in June 2021 HGGT sought significant new or revised information on infrastructure requirements identified for the HGGT area since the previous IDP was

produced in 2019 to inform a partial update of the HGGT IDP. Health and care services and the way

they are organised both from a commissioner and provider perspective will change over the lifespan

of the Plan.

Para 3.23 of Supporting Document I (EFDC IDP Update 2020) states: 'Secondary healthcare facilities such as hospitals are provided by hospital trusts, which in turn receive funding from the Department of Health and Social Care. Planning obligations towards secondary healthcare are not

regularly sought. However, land may be required for the relocation of the Princess Alexandra Hospital, and there may be a requirement to seek contributions from larger developments. Further work on this matter is currently being undertaken by the Princess Alexandra Hospital NHS Trust.'

The EFDC IDP 2020 identifies the need for developer contributions to healthcare to serve new development, covering primary healthcare, mental healthcare, community healthcare and acute care

(DW12). However, the notes on the District Wide Infrastructure Delivery Schedule at 4.1 of the IDP

state that the contribution is to be used to support delivery of GP floorspace set out elsewhere in this

IDP.

As a Trust, there is no routine eligibility for capital allocations from either DHSC or local commissioners to provide new capital capacity to meet additional healthcare demands. Therefore, S106 contributions are needed to mitigate the additional impacts of the Garden Town development

on acute services provision and are an important component of PAH's overall funding and delivery capabilities.

**Please set out what change(s) you consider necessary to make the Main Modification and/or supporting document legally compliant or sound, having regard to the test you have identified in the question above (Positively prepared/Justified/Effective/Consistent with national policy) where this relates to soundness. You will need to say why this change will make the Submission Version of the Local Plan legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.**

Therefore, PAH requests that the potential funding sources identified for the potential redevelopment of Princess Alexandra Hospital on land East of Harlow (EHA12) are updated to include Developer Contributions.t

PAH requests that the EFDC IDP 2020 is updated throughout to recognise both the changing model of care and that DHSC funding alone is not sufficient to meet acute healthcare infrastructure needs directly and proportionally related to the development identified in the Plan, required to make development acceptable in planning terms, and to deliver sustainable development.

Further detail is set out in PAH's Note of 5th August 2021 (see attached copy), along with the joint response prepared with the Hertfordshire & West Essex Integrated Care System (HWE ICS), Essex and North Hertfordshire Clinical Commissioning Group (ENHCCG), West Essex Clinical Commissioning Group (WECCG) and all providers that are commissioned to deliver healthcare services across the geographical area of HWE ICS dated 10th August 2021 to the HGGT IDP partial update, attached for information.

PAH's Note also sets out updated estimated transport infrastructure costs associated with Hospital relocation to East Harlow. PAH requests that the EFDC IDP 2020 (EHA6) is updated to reflect the updated costs for Hospital relocation transport mitigation measures.

Please see attached Lawson Planning Partnership Ltd representation letter dated 22nd September 2021 for full details.

## REPRESENTATION

**To which Main Modification number and/or supporting document of the Local Plan does your representation relate to?**

MM no: 107

Supporting document reference:

**Do you consider this Main Modification and/or supporting document of the Local Plan to be:**

Legally compliant: Yes

Sound: No

If no, then which of the soundness test(s) does it fail? Positively prepared, Effective, Justified, Consistent with national policy

**Please give details of why you consider the Main Modification and/or supporting document is not legally compliant or is unsound. Please be as precise as possible. If you wish to support the legal compliance, soundness of the Local Plan or compliance with the duty to co-operate, please also use this box to set out your comments.**

Please see attached Lawson Planning Partnership Ltd representation letter dated 22nd September

2021 for full details. Representation details also shown below as follows:

Chapter 6 Infrastructure & Delivery

MM107 Supporting Text to Policy D2 Essential Facilities and Services

PAH appreciates the attempt to update Paragraph 6.26 concerning PAH's redevelopment strategy, but objects to the current suggested wording on the grounds that it does not reflect the most up to date position and alternative wording is therefore, suggested. Through the OBC and related PPA processes, preapplication discussions have continued during 2020/21 between PAH, Epping & Harlow Local Authorities and the potential site for the new hospital has been identified north of the M11 J7a East-West link road and south of Pincey Brook, consistent with HGGT Key Diagram.

**Please set out what change(s) you consider necessary to make the Main Modification and/or supporting document legally compliant or sound, having regard to the test you have identified in the question above (Positively prepared/Justified/Effective/Consistent with national policy) where this relates to soundness. You will need to say why this change will make the Submission Version of the Local Plan legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.**

PAH therefore requests the wording of Paragraph 6.26 to read as follows (proposed changes shown in italics):

'6.26 The Princess Alexandra Hospital NHS Trust is currently considering options to meet its future service requirements through a development strategy and associated business case process. This work concerns the potential to relocate the Princess Alexandra Hospital (PAH) from its current site within Harlow to land north of M11 Motorway J7a and south of Pincey Brook within the Epping Forest part of the East of Harlow Garden Community (See policy SP4).'

PAH also notes the Council's proposed amendments to the supporting text to SP4 Development and Delivery of Garden Communities in the Harlow and Gilston Garden Town (AM13). PAH proposes additional text be inserted for clarity and to reflect the agreed current position with the planning and transport authorities, which would be consistent with the evidence presented at the EIP in 2019. PAH therefore, suggests the wording of Paragraph 2.112 is updated to read as follows (proposed changes show in italics):

'Included within this, is provision for the potential relocation of the Princess Alexandra Hospital from its current site in Harlow. In order to facilitate the future relocation of the hospital, a potential new site has been identified within the Garden Town – on land within the Epping Forest District part of the East of Harlow Garden Community north of M11 Junction 7a, south of Pincey Brook. The proposed relocation of the Hospital represents PAH's preferred development option, although a fall-back option comprises the refurbishment/redevelopment of the existing Hospital site.

Please see attached Lawson Planning Partnership Ltd representation letter dated 22nd September 2021 for full details.

Signature: John Lawson, Lawson Planning Partnership Ltd on behalf of PAH Date:  
23/09/2021